

IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

I, Charles Sullivan, a Special Agent (S.A.) of the Federal Bureau of Investigation (F.B.I.), United States Department of Justice (D.O.J.), hereinafter referred to as Affiant, being duly sworn under oath, hereby depose and state as follows:

INTRODUCTION

1. Affiant is an investigative or law enforcement Officer of the United States of America within the meaning of Title 18, U.S.C., § 2510(7) and Federal Rules of Criminal Procedure, Rule 41(a)(2)(C). Affiant is empowered to conduct investigations of and to make arrests for offenses enumerated in Title 18, U.S.C., §§ 3052 and 3107; and D.O.J. regulations set forth at Title 28, C.F.R., Sections 0.85 and 60.2(a).

2. Affiant has been employed as a Special Agent of the F.B.I. since February of 1998. While employed by the F.B.I., Affiant has investigated federal criminal violations related to bank robberies, drugs, weapons violations, interstate transportation of stolen property, cyber-crime, child exploitation, and child pornography and other general criminal offenses in the Northern District of Ohio.

3. Affiant has gained experience through training, seminars, classes, and everyday work related to conducting these types of investigations. Moreover, Affiant is a federal law enforcement Officer who is engaged in enforcing criminal laws, including violations of Title 18, U.S.C. § 2252A(a)(2), Receipt of Child Pornography.

4. Affiant is investigating the activities of Jeffrey A. Stanley of XXXX Ninevah Road (intentionally redacted), Ashtabula, Ohio 44004. As will be shown below, there is probable cause to believe that Jeffrey Stanley has received images of child pornography in violation of Title 18 U.S.C. § 2252A(a)(2), which prohibits a person from knowingly receiving any child pornography that has been mailed or shipped or transported using any means or facility of interstate or foreign commerce or affecting interstate or foreign commerce by any means, including by computer.

5. Since this affidavit is being submitted for the limited purpose of securing authorization for the requested arrest warrant, I have not included each and every fact known to me concerning this investigation. Instead, I have set forth only the facts that I believe are necessary to establish probable cause to believe Jeffrey Stanley violated 18 U.S.C. §2252A(a)(2).

BACKGROUND OF THE INVESTIGATION

6. In approximately October of 2016, Female #1 confided in a counselor that Jeffrey A. Stanley (hereafter "STANLEY") was accessing child pornography on his cellular phone. Female #1 told her counselor that STANLEY had two cellular phones, one that he used daily and one that he used to access child pornography.

7. On December 15, 2016, the counselor telephoned Det. Rose of the Ashtabula County Sheriff's Office and informed him that Female #1 had taken photographs of STANLEY's phone while she was at his home and without his knowledge. In the photographs were child pornographic images. Female #1 sent the photographs she had taken to Det. Rose's work email account and agreed to meet with Det. Rose. The content of the photographs include the following:

- a. A photograph of the screen of a cellular phone in the text message application. The header across the top indicates the name of the second party is "seath stevens". There appears to be a finger on the screen of the phone possibly pointing to a text message. Stevens texts to STANLEY "Mmmm do you have a daughter? If so how young is she? (winking emoji) STANLEY: Unfortunately not yet. I have a little boy and my wife won't let me get her pregnant again for a while.

Stevens: Damn (frowning emoji) because if you had a girl I'd start playing with her once she turns 3 if I were you hehe (winking emoji). STANLEY: I know. I would rub her tiny pussy with the head of my cock and shoot my pedo cream all over her (the rest of the message is cut off in the picture).

- b. A photograph of the screen of a cellular phone in the text message application. The header across the top indicates the name of the second party is "seath stevens". There appears to be a finger on the screen of the phone possibly pointing to a text message. Stevens texts to STANLEY something about "Kik". STANLEY responds: "It makes me so hard," "Lucky man," "Was that actually him and his daughter or just a video he found?" Stevens' text message is partially covered by a finger and ends with the words "was the dad." STANLEY replies: "It would have been. I want to do that with my daughter."

- c. A photograph of the screen of a cellular phone in the text message application. The header across the top indicates the name of the second party is "seath stevens". There appears to be a finger on the screen of the phone possibly pointing to a text message. Stevens texts to STANLEY "

- d. A photograph of the screen of a cellular phone in the text message application. The header across the top indicates the name of the second party is "seath stevens". There appears to be a finger on the screen of the phone possibly pointing to a text message. STANLEY's text is partially visible and ends with "young pussy." Stevens texts: "Mmmm fuck yes pure pedo fun and toddler joy (winking emoji) hehe," "My pedo cock is rock solid now mmmmm," "If I had kids I'd let you (blocked by finger) with me all (blocked) long (winking emoji) hehe." STANLEY texts: "Do you have any more videos of them sexy young girls?" Stevens responds: "No unfortunately I don't."
- e. A photograph of the screen of a cellular phone in the text message application. The header across the top indicates the name of the second party is "seath stevens". There appears to be a finger on the screen of the phone pointing to the photograph sent by Stevens to STANLEY of a female of very small stature photographed from behind while bent over. Her pubic area is the focus of the photograph and the area has no visible pubic hair. A hand can be seen spreading the buttocks and the size of the hand is only slightly smaller than the width of the buttocks. Stevens texts

to STANLEY "Omg yes." STANLEY responds: "Oh yes. What a mouth watering pussy," "I want to taste it so bad," "And rub it with my cock and cover it with my cum."

f. A photograph of the screen of a cellular phone in the text message application. The header across the top indicates the name of the second party is "seath stevens". There appears to be a finger on the screen of the phone pointing to a text message under the date "12/2/2016 @ 11:24 PM". Stevens texts to STANLEY "Mmm fuck yes me too you and me both (winking emoji) hehe." STANLEY texts back: "I would take the head of my cock and push it up against her tight young little pussy and shoot my cum so deep inside of her." Following the date of "12/3/2016 @ 5:38 PM" STANLEY texts: "Did you ever ask your friend if that was him and his daughter?" Stevens response is partially visible and is further captured on the following page. Stevens states: "That vid wasn't him it was a vid he got on the deep web."

g. A photograph of the screen of a cellular phone in the text message application. The header across the top indicates the name of the second party is "seath stevens". Stevens texts to STANLEY ""That would be hot if it was him though." There are two images sent

by Stevens to STANLEY. There is a circle with a right area in the center of the image, indicating the attachment is a video. The first image depicts an adult male penis in the hands of a prepubescent female. The female appears to be in a tub. The second image depicts a prepubescent female performing oral sex on an adult male penis. In the lower right corner of both images is the symbol "k." consistent with the logo for Kik Messenger, a cellular phone application.

8. On February 16, 2017, the counselor contacted Det. Rose and informed him that she learned from Female #1 that she had recently seen a conversation on STANLEY's phone where he was discussing with another man his desire to traffic a three-year-old Asian girl.

9. On February 22, 2017, Affiant and Det. Rose met with Female #1. She stated she observed images of child pornography on STANLEY's phone. She also saw discussions between STANLEY and "Seth Stevens" about trafficking a three-year-old Asian girl.

10. On March 1, 2017, Affiant and Det. Rose met with Female #1 in Ashtabula, Ohio. Female #1, on her own accord, had taken STANLEY's cellular phone. She stated to law enforcement she thought it was the only way to prove what she was saying was

true. Female #1 further stated she had looked at the cellular phone after taking it from STANLEY and saw conversations where STANLEY exchanged child pornography and discussed getting a three-year-old Asian girl. She stated there were pictures and videos of children being molested and children having sex with adults. She further stated she did not think STANLEY was sending any images but was asking for images to be sent to him.

11. Female #1 further stated that STANLEY had talked with others wishing he had a daughter he could share with them. STANLEY had talked to her in the past about wanting a daughter.

12. Female #1 gave STANLEY's cellular phone to Det. Rose on March 1, 2017, who then relinquished it to Affiant.

13. On July 30, 2018, Affiant obtained a federal search warrant for the Motorola 4G LTE cellular phone. A forensic extraction was done of the cellular phone the following day.

14. A review of the forensic extraction of the Motorola phone revealed 22 image files and 6 video files that depicted child pornography. A representative sample of those images are described as follows:

- a. File Name: 5c03840e-775f-4925-b8c8-5528399c56b3
File Extension: jpg
Date Created: 12/02/2016 at 7:10 am
Description: A nude, prepubescent female, being less than 5 years of age, laying on her back on a bed with her legs spread apart exposing her genitalia. White colored rope is tied around each of the child's wrists, which is tied to the headboard of the bed.

- b. File Name: b3371d60-4491-4e3a-9f9e-8cf2ac684025
File Extension: mp4
Date Modified: 12/10/2016 at 6:53 pm File Size: 650 K
File Duration: 59 Seconds
Description: A minor female, being less than 5 years of age, masturbating an adult male in a bath tub.
[This is the same video described in paragraph 7(g)]
- c. File Name: b1a73935-42a7-4dd6-8938-78408e07e41e
File Extension: mp4
Date Modified: 12/10/2016 at 6:53 pm
File Duration: 15 Seconds
Description: A minor female, being less than 5 years of age, giving oral sex to an adult male.
[This is the same video described in paragraph 7(g)]
- d. File Name: d97b9272-9238-4a78-a1dd-58b843496d0
File Extension: mp4

Date Modified: 02/15/2017 at 4:53 pm
File Duration: 21 Seconds
Description: A minor female, being less than 10 years of age, giving oral sex to an adult male.

15. Affiant reviewed the forensic extraction of the Motorola phone and observed numerous entries/files that corroborated Female #1's statement that the phone belonged to STANLEY. For example, in the "Contacts" data under the name, "Ma" was a telephone number ending in XXX-XX-7145. A Google search of this phone number confirmed the telephone number was listed to STANLEY's mother, Marley Stanley. Under the name "shop" was listed the number XXX-XXX-3942, which is the telephone number for the Reese Machine Company, Inc. in

Ashtabula, Ohio. Affiant contacted the manager of Reese Machine Company and learned that STANLEY was employed there as a machinist from April 30, 2012 through January 13, 2017.

16. Affiant located in the "Calendar" category an entry on "August 8" that said "Happy Birthday." This entry corresponds with STANLEY's birthday.

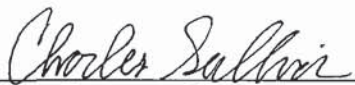
17. Affiant further reviewed the "Call Log" and "SMS Messages" and observed numerous calls and text messages to Female #1's phone number, including text messages referencing Female #1's son. In the photo section of the extraction were numerous images and videos of STANLEY, his minor son, and Female #1.

18. In addition, in the "Text Message" portion of the cellular phone extraction, Affiant observed a text message from Hyundai that began with "Hi Jeffrey," and thanked him for the perfect survey score and hoped he was enjoying his Veloster. A review of Ohio BMV records confirmed Jeffrey Stanley had a blue 2016 Hyundai Veloster registered in his name from February 15, 2016 through August 8, 2017.

19. Based on the aforementioned factual information, Affiant respectfully submits that there is probable cause to believe that Jeffrey Stanley knowingly violated Title 18, United States Code, §§ 2252A(a)(2).

1:18MJ9142


20. Affiant, therefore, respectfully requests that the attached arrest warrant be issued authorizing the arrest of Jeffrey A. Stanley.



Charles Sullivan
Special Agent
Federal Bureau of Investigation

Sworn to via telephone after submission by reliable electronic means, pursuant to Fed. R. Crim. P. 4.1 and 41(d)(3), this Jul 31, 2018 day of July, 2018.





William H. Baughman, Jr.
United States Magistrate Judge